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40     *Counsel for Robert Bosch LLC and  
41     Robert Bosch GmbH*

42     **UNITED STATES DISTRICT COURT**  
43     **NORTHERN DISTRICT OF CALIFORNIA**

44     IN RE CHRYSLER-DODGE-JEEP  
45     ECODIESEL MARKETING, SALES  
46     PRACTICES, AND PRODUCTS  
47     LIABILITY LITIGATION

48     This Document Relates to:  
49     **ALL ACTIONS**

50     Case No. 3:17-md-02777-EMC

51     **STIPULATION AND [PROPOSED]  
52     ORDER TO EXTEND TIME TO  
53     FILE JOINT PROPOSED  
54     ELECTRONICALLY STORED  
55     INFORMATION PROTOCOL**

56     WHEREAS, pursuant to the Court's Pretrial Order No. 12 (Docket No. 222) and  
57     Amended Pretrial Order No. 12 (Docket No. 227), the Plaintiffs' Steering Committee, on behalf  
58     of the consumer and reseller dealer class plaintiffs, the Department of Justice, on behalf of the  
59     United States Environmental Protection Agency, and counsel for Defendants FCA US LLC, Fiat  
60     Chrysler Automobiles N.V., V.M. Motori S.p.A., V.M. North America, Inc., Sergio Marchionne,

1 Robert Bosch, LLC, and Robert Bosch GmbH (collectively, “Defendants”) (jointly, “the Parties”)  
2 are required to submit a joint proposed Electronically Stored Information (“ESI”) Protocol within  
3 thirty (30) days of the entry of Pretrial Order No. 12;

4           WHEREAS, thirty (30) days from the entry of Pretrial Order No. 12 (Docket 222) is  
5           October 28, 2017 and thirty (30) days from the entry of Amended Pretrial Order No. 12 (Docket  
6           227) is November 1, 2017;

7        WHEREAS, the Parties have met and conferred, and exchanged drafts of the joint  
8 proposed ESI Protocol;

9        WHEREAS, the Parties have reached agreement on a substantial portion of the issues  
10      addressed by the joint proposed ESI Protocol; and

WHEREAS, due to the complexities of the technical issues involved with developing a joint proposed ESI Protocol that completely and comprehensively addresses the issues involved, the Parties require additional time to continue negotiations and finalize agreed terms;

15 IT IS THEREFORE STIPULATED AND AGREED by the Parties, subject to the Court's  
16 approval, as follows:

17           1. The deadline for the Parties to file their joint proposed ESI Protocol is November  
18           14, 2017.

19 Dated: October 27, 2017 Respectfully submitted,

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

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*Plaintiffs' Lead Counsel and Chair of the Plaintiffs' Steering Committee*

1 Dated: October 27, 2017

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17 *Marchionne*

18 Dated: October 27, 2017

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28 Dated: October 27, 2017

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38 *Government Coordinating Counsel*

**[PROPOSED] ORDER GRANTING STIPULATION TO EXTEND TIME**

Based on the foregoing Stipulation, the Court GRANTS the Parties' Stipulation to Extend Time to File Joint Proposed Electronically Stored Information Protocol. The deadline for the Parties to file their joint ESI Protocol is November 14, 2017. 

IT IS SO ORDERED.

DATED: 10/30 , 2017



**ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))**

In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the filing of this document has been obtained from the signatories.

Dated: October 27, 2017

/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 27, 2017, a true and correct copy of the foregoing was electronically filed and served electronically via the Court's CM/ECF system, which will automatically serve notice to all registered counsel of record.

/s/ Elizabeth J. Cabraser  
Elizabeth J. Cabraser